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April 20, 2018

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: NOTICE OF EX PARTE – WC Docket No. 10-90: Connect America Fund

Dear Ms. Dortch:

On April 18, 2018, Chairman Roy Brown of the Northern Arapaho Tribe of Wind River Reservation in Wyoming, Patrick Lawson, General Manager of Northern Arapaho Tribal Industries, Madonna and Melvin Yawakie of TICOM, Inc. (collectively “NATI”), and the undersigned met separately with Chairman Ajit Pai and his Legal Advisor Niraly Patel, Commissioner Brendan Carr and his Legal Advisor Jamie Susskind, Mr. Travis Litman, Legal Advisor to Commissioner Jessica Rosenworcel, and Ms. Amy Bender, Legal Advisor to Commissioner Michael S. O’Rielly. We also met with Sue McNeil and Christian Hoefly, Jr. of the Wireline Competition Bureau, Barbara Esbin, Deputy Bureau Chief of the Consumer and Governmental Affairs Bureau, and Matthew Duchesne, Sayuri Rajapakse, and Janet Sievert of the FCC’s Office of Native Affairs and Policy.

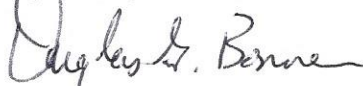
NATI brought the Commission up to date on its provision of fixed wireless broadband and VoIP services to residents, businesses and community anchor institutions on the Wind River Reservation, including its investment in middle mile fiber and ongoing deployment of Fiber to the Premises (FTTP) services as a model for delivering broadband services to the historically unserved and underserved Tribal areas of the Wind River Reservation. Attendees also discussed the impacts on NATI, its network and Tribal residents of the Commission’s Connect America Fund Phase II Reports and Orders, including high cost and extremely high cost areas that are not among areas identified by the Commission’s Connect America Fund Phase II model. NATI representatives distributed the attached written presentation with their meeting, a non-confidential copy of which is being made public. Because some of the content, and the final page, contain commercially sensitive non-public data of NATI, the disclosure of which could cause substantial harm to the company’s competitive position, we request that the non-public,

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unredacted version be accorded confidential treatment in accordance with Section 0.459 of the Commission's Rules. The non-public version of the attached presentation is being filed separately with the Secretary of the Commission along with NATI's request for confidential treatment.

Respectfully submitted,



Douglas G. Bonner

Counsel to Northern Arapaho Tribal Industries

Enclosure

cc: Niraly Patel, Legal Advisor to Chairman Pai
Jamie Susskind, Legal Advisor to Commissioner Carr
Travis Litman, Legal Advisor to Commissioner Rosenworcel
Amy Bender, Legal Advisor to Commissioner O'Rielly
Sue McNeil
Barbara Esbin
Christian Hoeffly, Jr.
Matthew Duchesne
Sayuri Rajapakse
Janet Sievert

**Northern Arapaho Tribal Industries
Fiber Broadband Project**

Project Description

Northern Arapaho Tribal Industries (NATI), doing business as Wind River Internet (WRI) is constructing a fiber based broadband infrastructure through a Fiber to the Premise (FTTP) Internet Protocol (IP) based system, to government, education, businesses, and residential subscribers within the boundaries of the Wind River Indian Reservation (WRIR) located in Wyoming. Very limited to no broadband exists within the WRIR which is considered an underserved and unserved area as defined by the Federal Communication Commission. NATI is a 100% Tribal Owned Corporation of the Northern Arapaho Tribe, that established WRI in 2011. WRI currently provides *fixed terrestrial broadband Internet services* to ten business customers that include schools, healthcare facilities, tribal government, and businesses operating within the WRIR. WRI provides *fixed wireless* voice services to 800 customers and 600 Internet Service customers that include both business and residential subscribers.

WRIR is provided communication services by two wireline telecommunication providers that operate in certain portions of the reservation. CenturyLink is designated as a Price Cap Carrier that provides services to the tribal communities of Arapahoe, Ethete, and Ft. Washakie via the Riverton and Lander exchanges. CenturyLink's Analog Loop Carrier (ALC) system serves significant portions of the WRI's targeted serve area. The ALC's were manufactured in the early 70's and are still maintained by CenturyLink. The age and condition of this system limits the type and quality of telecommunication services available to the businesses and residents located in WRI's proposed service area. CenturyLink has acknowledged that broadband service is limited to non-existent in WRI's proposed service area, and that they do not have plans to upgrade their system. **[BEGIN CONFIDENTIAL]**

[END CONFIDENTIAL] Separately, Dubois Telephone Exchange (DTE) is a Rate of Return Carrier and is a subsidiary of Range Telephone Cooperative and serves the area northwest of Ft. Washakie, via the Crow Heart exchange.

WRI Upgrade and Expansion

NATI completed a Broadband Feasibility Study in 2014 and has in place a detailed project plan. **[BEGIN CONFIDENTIAL]**

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[END CONFIDENTIAL] The FTTP network is a “Greenfield” Project and is designed for high capacity, high density Gigabit Ethernet access with capabilities to provide IPTV, Broadband Internet, and Voice services to subscribers located within its proposed service Area. The network will provide fiber connectivity to **[BEGIN CONFIDENTIAL] [END CONFIDENTIAL]** single-family units, MDUs, government buildings, tribal programs, schools, health care facilities, other community anchor institutions, and businesses. Once completed, WRI’s FTTP network will cover approximately **[BEGIN CONFIDENTIAL][END CONFIDENTIAL]** square miles and is projected to pass **[BEGIN CONFIDENTIAL][END CONFIDENTIAL]** homes.

WRI is deploying a “Home Run” network architecture that utilizes Active Ethernet as its essential technology to provide 1 Gigabit performance for its broadband Internet access service. The Home Run architecture provides dedicated fibers that run directly between the Optical Line Terminals (OLT), and Optical Network Terminals (ONT) in the WRI network. The OLTs are designed to be installed in an environmentally controlled central office, and the ONTs will be installed at the subscriber premises.

WRI has the experience to operate and maintain the FTTP Active Ethernet broadband system. As a broadband service provider, the internal staff of WRI currently operates their fixed wireless and fiber backhaul network. WRI’s management team consists of its CEO and President, and Vice President and General Manager. WRI currently has 5 Technicians and 3 Customer Service Representatives who perform the day-to-day operations and service provisioning of the broadband system and will continue to provide the operational support as the network transitions to a fully functional FTTP system.